

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**BRYAN ANTHONY REO**

Plaintiff,

v.

**LUDIVINE JOAN CLAUDIA REYNAUD**

Defendants.

**Case No. 1:22-cv-00510-JG**

**Hon. James S. Gwin**

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**REO LAW, LLC**

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*Pro se Plaintiff*

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**PLAINTIFF BRYAN ANTHONY REO'S**  
**REPLY TO MOTION TO COMPEL DISCOVERY**

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NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Defendant Ludivine Joan Claudia Reynaud ("Reynaud" or "Defendant") and this Honorable Court, Plaintiff's Reply to Motion to Compel Discovery of Defendant Ludivine Joan Claudia Reynaud.

Plaintiff hereby provides notice that at approximately 1:30pm EST on 13 September 2022, Defendant, through Counsel, provided what she purports to be valid and current contact

information for Emmanuel Brun d'Aubignosc, as regards phone number, email, and street address. Plaintiff accordingly advises the Court that ECF No. 56 is moot as to the underlying request to compel the information/disclosure, excepting for the matter of whatever sanction the Court, in its discretion, may deem appropriate for Defendant's extreme dilatory behavior and having necessitated Plaintiff bringing the matter before the Court in the first place.

It should not have taken this long for a disclosure that should have been made in initial disclosures, or for information that should certainly have been provided in response to an explicit request in formal discovery, and it should not have taken motion practice to obtain this contact information. The Court can and should levy some sanction. It won't be practical or desirable for Plaintiff to have to bring every single discovery matter before this Court every time Defendant decides to cause a several week delay by sitting on information readily within her control when the information must be disclosed.

Respectfully submitted,

/S/. BRYAN ANTHONY REO

Bryan Anthony Reo

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*Pro se Plaintiff*

Dated: September 13, 2022

**CERTIFICATE OF SERVICE**

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on September 13, 2022, I submitted this Certificate of Service and Plaintiff Bryan Anthony Reo's Reply to Motion to Compel Discovery the Court's Electronic Filing System, which should serve the same upon the attorneys of record for Defendant Ludivine Joan Claudia Reynaud.

/S/ BRYAN ANTHONY REO

Bryan Anthony Reo

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*Pro se Plaintiff*

Dated: September 13, 2022